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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

TECHNOLOGY PROPERTIES LIMITED  
 LLC and MCM PORTFOLIO LLC,

Plaintiffs,

v.

CANON, INC., et al.,

Defendants.

Civil Action No. 14-03640 CW

**DEFENDANTS' ADMINISTRATIVE  
 MOTION TO ENLARGE PAGE LIMIT  
 FOR JOINT OPPOSITION BRIEF RE  
 CLAIM CONSTRUCTION**

TECHNOLOGY PROPERTIES LIMITED  
LLC and MCM PORTFOLIO LLC,

Plaintiffs,

v.

FALCON NORTHWEST COMPUTER  
SYSTEMS, INC.,

Defendant.

Civil Action No. 14-03641 CW

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO ENLARGE PAGE LIMIT  
FOR JOINT OPPOSITION BRIEF RE  
CLAIM CONSTRUCTION**

TECHNOLOGY PROPERTIES LIMITED  
LLC and MCM PORTFOLIO LLC,

Plaintiffs,

v.

HEWLETT-PACKARD COMPANY,

Defendant.

Civil Action No. 14-03643 CW

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO ENLARGE PAGE LIMIT  
FOR JOINT OPPOSITION BRIEF RE  
CLAIM CONSTRUCTION**

TECHNOLOGY PROPERTIES LIMITED  
LLC and MCM PORTFOLIO LLC,

Plaintiffs,

v.

NEWEGG INC., et al.,

Defendants.

Civil Action No. 14-03645 CW

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO ENLARGE PAGE LIMIT  
FOR JOINT OPPOSITION BRIEF RE  
CLAIM CONSTRUCTION**

TECHNOLOGY PROPERTIES LIMITED  
LLC and MCM PORTFOLIO LLC,

Plaintiffs,

v.

SEIKO EPSON CORPORATION., et al.,

Defendants.

Civil Action No. 14-03646 CW

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO ENLARGE PAGE LIMIT  
FOR JOINT OPPOSITION BRIEF RE  
CLAIM CONSTRUCTION**

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TECHNOLOGY PROPERTIES LIMITED  
LLC and MCM PORTFOLIO LLC,

Plaintiffs,

v.

SHUTTLE INC., et al.,

Defendants.

Civil Action No. 14-03647 CW

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO ENLARGE PAGE LIMIT  
FOR JOINT OPPOSITION BRIEF RE  
CLAIM CONSTRUCTION**

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## RELIEF SOUGHT

Pursuant to Civil Local Rule 7-11, Defendants Canon Inc.; Canon U.S.A., Inc.; Shuttle Computer Group Inc.; Newegg Inc.; Rosewill Inc.; and Falcon Northwest Computer Systems, Inc.; Seiko Epson Corporation; Epson America, Inc.; and Hewlett-Packard Company (collectively, “Defendants”<sup>1</sup>) request an enlargement of the page limit by 10 pages for Defendants’ Opposition Brief on Claim Construction, which is due on April 23, 2015. Enlarging Defendants’ Joint Opposition Brief from 25 to 35 pages is necessary to provide Defendants with additional room to set forth their claim constructions and respond to Plaintiffs’ constructions. Plaintiffs have declined to stipulate to this extension, as confirmed in the accompanying Declaration of T. Cy Walker.

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## ARGUMENT

There are nine claim terms across three patents in dispute. Each patent has its own prosecution history. There are claim terms that have no plain and ordinary meaning, claim terms that have been limited by statements made in the patents or in the prosecution histories, and claim terms that have been drafted in means-plus-function form. Proper construction requires consideration of the terms’ usage in the claims, the specification, and the prosecution histories. The additional pages are necessary to discuss these materials and explain their influence on claim construction in a way that the Court and its technical advisor can more easily follow and understand. The additional pages also are needed to harmonize the arguments of the six separate defendants on nine claim terms into a single brief for presentation to the Court.

The additional pages also are requested to allow the Defendants to incorporate into their brief the relevant figures and statements from the patents and prosecution histories, so the arguments are illustrated within the brief and are easy to follow without the reader having to continually refer to and locate the cited passages of supporting documents. Without additional pages, Defendants likely will have insufficient room to incorporate this material and, instead, will need to rely on citations to the supporting materials only. While replacing figures and passages

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<sup>1</sup> Sony Corporation and Sony Corporation of America have informed the Defendants that they have reached an agreement in principle with the Plaintiffs and will no longer be participating in claim construction.

1 from the patents and prosecution histories with citations reduces the page count, it does so at the  
2 expense of clarity and convenience, and will tend to increase the overall burden on the Court and  
3 its technical advisor.  
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7 Dated: April 14, 2015

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9 By: /s/Megan Whyman Olesek

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served on all counsel for all parties of record on April 15, 2015 via the Court's CM/ECF system.

/s/ Gordon Fauth